



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 1, 2023

BY ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

APPLICATION GRANTED
SO ORDERED *Vernon S. Broderick*
VERNON S. BRODERICK
U.S.D.J. 12/01/2023

Re: *United States v. Ramirez-Rodriguez, 23 Cr. 363 (VSB)*

Dear Judge Broderick:

The Government writes with respect to defendant Lepido Ramirez-Rodriguez's motion to dismiss the Indictment. *See* Dkt. Nos. 14-15. The Government's response is currently due on December 1, 2023.

The Government respectfully requests that its deadline to respond to the defendant's motion be extended to Monday, December 4, 2023. The Government is requesting this brief extension due to the complexity of the arguments raised and the need to consult internally to frame the issues for the Court in the most helpful manner. Due to the exigent nature of the request, the Government has not discussed the proposed modification of the briefing schedule with defense counsel, although the Government consents to a reciprocal extension of the deadline for the defendant's reply.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By:

Jerry J. Fang
Jerry J. Fang
Assistant United States Attorney
Southern District of New York
(212) 637-2584
Jerry.Fang@usdoj.gov

Cc: Kristoff Williams, Esq. (by ECF)